

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

ROCHELLE L. TURNER

Defendant.

Criminal No. 25-I-006

18 U.S.C. § 287

INFORMATION

BACKGROUND

1. The United States Department of Health and Human Services ("HHS") funded the State of Tennessee Department of Human Services ("TDHS") Temporary Assistance for Needy Families ("TANF") Emergency Cash Assistance ("ECA") program. The ECA program provided financial assistance to families that had been significantly affected by the COVID-19 pandemic because of lost employment.
2. The defendant **ROCHELLE L. TURNER** engaged in a scheme to submit false, fictitious, and fraudulent letters to the ECA program purporting to be from employers verifying that she and other individuals had lost their employment because of the COVID-19 pandemic.

COUNT 1

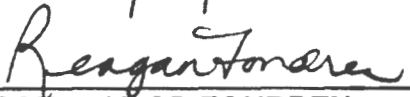
3. From on or about March 11, 2020, to on or about May 13, 2020, in the Western District of Tennessee,

ROCHELLE L. TURNER

made and presented to the federally funded Tennessee Emergency Cash Assistance program claims upon and against the United States Department of Health and Human

Services("HHS") knowing that these claims were false, fictitious, and fraudulent; in violation of Title 18, United States Code, Section 287.

DATED: 3/21/25



REAGAN TAYLOR FONDREN
ACTING UNITED STATES ATTORNEY

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NOTICE OF PENALTIES

COUNT 1

[nmt 3 yrs, \$100,000 fine, or both; nmt 1 yr supervised release; \$100 special
assessment.]

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ELEMENTS OF THE OFFENSE

To sustain a conviction under 18 U.S.C. section 287, the government must prove: 1) the defendant made a claim against an agency of the United States; 2) the claim was false or fraudulent; 3) the defendant knew the claim was false or fraudulent; and 4) the fraudulent claim was material to the federal agency involved.